

SECTION H
PERSONNEL TRAINING

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CHECKLIST FOR REVIEW OF KANSAS HAZARDOUS WASTE PROGRAM PERMIT APPLICATION

SECTION H – PERSONNEL TRAINING

H-1 Outline of Introductory and Continuing Training programs [40 Code of Federal Regulations {CFR} §270.14(b)(12) and 264.16(a)(1)]

D&Z uses an extensive training program for employees at all levels. The training includes plant safety, explosive materials safety, and emergency response for all employees; and specialized training for employees assigned to work in hazardous waste management areas (see Table H-1).

H-1a Job Title/Job Description [40 CFR §270.14(b)(12) and 264.16(d)(1), (d)(2)]

The D&Z organization for hazardous waste management is depicted in Figure B-2 (see Section B). The organization is a cooperative effort between a number of plant divisions and services, with the main responsibility and coordination through the Plant Environmental Coordinator. Job descriptions of employees are maintained by D&Z (See Section H-2).

The following job titles and job descriptions are provided hazardous waste management training based on their job descriptions:

- Munitions Demolition Operator – performs OD operations and hazardous waste (HW) warehousing operations
- Fire Fighter – responsible for facility fire prevention program
- Stores Foreman (Warehousing and Assets) – supervises OD and HW warehousing operations
- Heavy Driver – transports HW
- Heavy Equipment Operator – performs spill cleanup operations
- Director of Facilities Operations; second alternate on-scene coordinator for spills
- Supervisor Line Maintenance – supervises spill cleanup operations; alternate on-scene coordinator for spills
- Safety and Fire Engineer – responsible for overall safety of facility including HW operations; Safety Advisor for spills
- Environmental Project Engineer – conducts HW training program; on-scene coordinator (Primary Emergency Coordinator) for spills
- Human Resources Generalist – coordinates HW training; responsible for HW training records; responsible for security of facility

H-1b Description of How Training will be Designed to Meet Actual Job Tasks [40 CFR §270.14(b)(12) and 264.16(c) and (d)(3)]

The general training program includes an indoctrination for new employees; development and periodic revision of Standing Operating Procedures (SOP); and on-going instruction through group safety meetings. An outline of the training program for all hazardous waste management personnel is presented in Table H-1. Supervisors are trained, and in turn, will train operators. This training is presented to all hazardous waste management personnel a minimum of once a year. Attendance lists for the training sessions are maintained by D&Z (see Figure H-1).

For operators and other personnel involved in operating the OD grounds or in emergency response for the OD grounds, a training program has been developed by the Training Director. This training covers both normal operating situations and exceptional incidents (see Table H-1).

To keep abreast of current regulations and technology concerning environmental control, all personnel within the Environmental Engineering section at D&Z attend offsite courses encompassing various environmental management topics, as appropriate.

H-1c Training Director [40 CFR §270.14(b)(12) and 264.16(a)(2)]

D&Z's hazardous waste training program is directed by the Environmental Project Engineer at D&Z. The Training Director must be knowledgeable in hazardous waste management procedures as well as all the operations conducted at the facility. The job responsibilities of the Training Director include but are not limited to the following: reports to the Director of Facilities Operations; responsible for developing, implementing, and coordinating policies on matters involving HW; provides advice to management on the practical and necessary steps to prevent or abate pollution arising from company HW operations; assures compliance with federal and state HW regulations regarding environmental control; and assigns HW management task responsibilities to subordinate Environmental Engineering personnel.

H-1d Relevance of Training to Job Position [40 CFR §270.14(b)(12) and 264.16(a)(2)]

All personnel involved in hazardous waste management will attend a hazardous waste management awareness session a minimum of once a year. This session will include (but not be limited to) the following:

1. Awareness of the hazardous wastes being managed at the facility and their possible effects on the environment.
2. Capability to identify a hazardous waste release that could or could not immediately endanger human health or the environment.
3. Awareness of correct procedures for implementing the Contingency Plan (e.g., who to contact in the event that a spill occurs; procedures to be followed to prevent further releases; communication protocols and procedures for responding to fires, explosions, and contamination incidents; and cleanup procedures).

H-1e Training for Emergency Response [40 CFR §270.14(b)(12) and 264.16(a)(3)]

Facility personnel are trained to respond effectively in emergencies. The training is designed to assure that personnel are familiar with emergency procedures, location and use of emergency equipment, and location and use of emergency systems (including alarm and other communication systems). See Section F and the Contingency Plan (Section G) for additional information regarding preparedness and prevention, and emergency response.

Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment are included in the Contingency Plan and applicable SOPs. Communications, alarm system are addressed in Section F-3. Response to fires is addressed in Sections F and G and in the Contingency Plan.

H-2 Maintenance of Training Records/Copy of Personnel Training Documents [40 Code of Federal Regulations [40 CFR §270.14(b)(12) and 264.16(b), (d)(4), (e)]

To implement training requirements specified in 40 CFR Part 264, with the exception of the exclusions and modifications noted in *Kansas Administrative Regulations* (KAR) 28-31-264, a person trained in hazardous waste management procedures has been identified (see Section H-1c). The Environmental Project Engineer and the Human Resources section of D&Z is responsible for development of all training material and recordkeeping. The following records will be maintained at the office:

1. Job title and employee name for all hazardous waste management positions.
2. A written job description for each position.
3. A written description of the introductory and continuing training given to each person employed for hazardous waste management activities.
4. All training records for employees are kept onsite during the course of employment and for a minimum of three years following termination of employment.

FIGURE H-1
TRAINING DOCUMENTATION FORM

Hazardous Waste Training Certification

I have received and understand the information presented during the Introductory or Annual Hazardous Waste Management and Contingency Plan Training. The information included instructions on:

- 1) Responding effectively to emergencies;
- 2) Hazardous waste management procedures relevant to my job position; and
- 3) Procedures for performing hazardous waste management unit inspections.

Name (Print)

Signature

Badge No.

Date

TABLE H-1

TRAINING PROGRAM OUTLINE HAZARDOUS WASTE MANAGEMENT

TRAINING PROGRAM OUTLINE HAZARDOUS WASTE MANAGMENT

- I. Introduction
 - A. Brief explanation of Kansas Hazardous Waste Program
 - B. Purpose of training
 - 1. Introductory
 - 2. Annual
- II. Definitions
 - A. Hazardous waste management units
 - 1. Treatment – D&Z
 - a. Open Demolition Grounds (OD)
 - 2. Storage – D&Z
 - a. Igloos
 - b. Magazine
 - 3. Disposal – No hazardous waste disposal at D&Z
 - B. Hazardous Waste – Explanation of types (ignitable = I; corrosive = C; reactive = R; toxic = T, Listed waste = L)
 - 1. On-plant hazardous waste:
 - a. Freon (T)
 - b. Toluene (I, T)
 - c. Acetone (I)
 - d. Waste explosives (R)
 - e. Sludge from explosive treatment sumps (L)
 - f. Spent carbon from carbon columns (R)
 - g. Petroleum naphtha, paint thinner (I)
 - h. Alcohol (I)
 - i. Paint sludge from waterfall booth (T)
 - j. Tetrachloroethylene (T)
 - k. 1, 1, 1-Trichloroethane (T)
 - l. Lithium (C)
 - m. Others
- III. Contingency Plan
 - A. Purpose
 - B. Definition of event (i.e., spill, release, potential fire)
 - C. List of available equipment
 - 1. Vehicles
 - 2. Internal communications/alarm system
 - 3. Telephone or hand-held two-way radio
 - 4. Fire extinguishers
 - 5. Dispersants
 - 6. Limestone gravel
 - a. Gravel or sawdust
 - b. Hay or straw bales
 - c. Absorbent pads

IV. Management Procedures

- A. Satellite accumulation areas
 - 1. Labeling
 - a. Date of when the container is full
 - b. Contents identification
 - c. Move within 3 days
- B. Safe handling procedures
 - 1. Appropriate protective clothing or equipment
- C. Treatment methods
 - 1. Waste explosives –OD
 - 2. Waste components –OD
 - 3. Other
- D. Storage
 - 1. Sludge (explosive wastewater treatment)
 - 2. Paint sludge (waterfall spray paint booth)
 - 3. Toluene
 - 4. Acetone/ink
 - 5. Tetrachloroethylene (duplicating solution)
 - 6. 1, 1, 1-Trichloroethane
 - 7. Lithium
 - 8. Freon
 - 9. Waste explosives
 - 10. Waste components
 - 11. Satellite Accumulation Areas
 - 12. Other

V. Inspections

- A. Kansas Hazardous Waste Program Equipment Inspection (at regulated units)
 - 1. Emergency shower and eyewash
 - 2. Fire extinguishers
 - 3. Fire alarm system
 - 4. Telephone system
 - 5. First aid equipment and supplies
 - 6. Use of Kansas Hazardous Waste Program Equipment Inspection Form
- B. Demolition grounds (OD)
 - 1. Daily (as used) for spills
 - 2. Use of General Hazardous Waste Management Units Inspection Form (D&Z 933)
- C. Hazardous Waste Igloos
 - 1. Containers (weekly)
 - a. Corrosion
 - b. Leaking
 - c. Deterioration
 - 2. Construction (weekly)
 - 3. Use of General Hazardous Waste Management Units Inspection Form (D&Z 933)
- D.

VI. Conclusion

VII. Questions and Answers

APPENDIX H-1

**CHECKLIST FOR REVIEW OF KANSAS HAZARDOUS WASTE PROGRAM PERMIT
APPLICATION**

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS					
SECTION H. PERSONNEL TRAINING					
Section and Requirement		Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
H-1	Outline of Introductory and Continuing Training Programs	270.14(b)(12); 264.16(a)(1)	Facility personnel must successfully complete classroom or on-the-job training which will allow them to responsibly perform in their positions.	Section H-1	
H-1a	Job Title/Job Description	270.14(b)(12); 264.16(d)(1), (d)(2)	Owner or operator must maintain records of job titles, names of employees, job descriptions, and types and amounts of training given to employees.	Section H-1a	
H-1b	Description of How Training will be Designed to Meet Actual Job Tasks	270.14(b)(12); 264.16(c),(d)(3)	Training must be conducted by a qualified person; there must also be an annual review of the training.	Section H-1b	
H-1c	Training Director	270.14(b)(12); 264.16(a)(2)	Program must be directed by person trained in hazardous waste procedures.	Section H-1c	
H-1d	Relevance of Training to Job Position	270.14(b)(12); 264.16(a)(2)	Training must include instruction on hazardous waste procedures relevant to each employee's position.	Section H-1d	
H-1e	Training for Emergency Response	270.14(b)(12); 264.16(a)(3)	Personnel must minimally be familiar with emergency procedures, emergency equipment, and emergency systems.	Section H-1e	
H-2	Maintenance of Training Records/Copy of Personnel Training Documents	270.14(b)(12); 264.16(b),(d) (4),(e)	Training records on current personnel must be kept until closure of facility. Training must be completed within 6 months after date of employment.	Section H-2	

Notes:

^a Considerations in addition to the requirements presented in the regulations.^b For each requirement, this column must indicate one of the following: NA for not applicable, IM for information missing, or the exact location of the information in the application.^c If application is deficient in an area, prepare a comment describing the deficiency, attach it to the checklist, and reference the comment in this column.